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Privacy Policy

This Privacy Policy provides information on how, InterRe Insurance Brokers Pty Ltd manage personal information collected by InterRe Insurance Brokers Pty Ltd.

InterRe Insurance Brokers Pty Ltd is bound by the *Privacy Act 1988* (Cth) (Act) and the Australian Privacy Principles (**APPs**) set out in the Act. However, a great deal of the work performed by InterRe Insurance Brokers Pty Ltd falls within the following permitted general situations as set out in section 16A of the Act:

- The collection, use or disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim; or
- The collection, use or disclosure is reasonably necessary for the purposes of a confidential alternative dispute resolution process.

Except where a permitted general situation applies, this Privacy Policy will apply to all dealings with us, whether in person, or via telephone, email, correspondence or our website at www.interre.com.

InterRe Insurance Brokers Pty Ltd I will ensure that all officers, employees and subcontractors are aware of and understand InterRe Insurance Brokers Pty Ltd obligations as well as their own obligations under the Act. We will achieve this through the provision of training and through maintaining and implementing internal policies and procedures to prevent personal information from being collected, used, disclosed, retained, accessed or disposed of improperly.

What is 'personal information'?

'Personal Information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Collection of personal information

InterRe Insurance Brokers Pty Ltd collects personal information in order to carry on its business as a legal service provider.

The information which we collect will depend upon the reason for which it is collected. The main reasons are:

- to provide insurance services - in the course of acting for a client we are likely to collect personal information about individual clients and third parties. The type of personal information collected will vary from policy to policy;
- for marketing - during meetings with individual clients and contacts we sometimes collect their contact details in order to be able to send them newsletters and updates about insurance developments in their area of interest or to otherwise market our services to them.
- to respond to comments, enquiries or requests made via our website.

InterRe Insurance Broker Pty Ltd will, if it is reasonable or practicable to do so, collect personal information directly from the relevant individual.

Sometimes we will collect personal information from a third party or a publicly available source.

For example, we may need to collect personal information from an asic web site.

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If we receive personal information that we did not solicit, we will determine as soon as reasonably practicable whether we could have lawfully collected that information as part of our functions or activities. If we are not satisfied that we could have lawfully collected the information, then we will (if it is lawful and reasonable) destroy the information or ensure that it is de-identified.

Use and disclosure of personal information

Any personal information collected by InterRe Insurance Broker Pty Ltd will only be used and disclosed for the purpose for which it has been provided to us or as authorised under law.

We may use your contact details to send you firm newsletters, insurance updates or invitations to InterRe Insurance Broker Pty Ltd seminars or events, which may be of interest to you. However, you may at any time opt out of receiving such materials by contacting InterRe Insurance Broker Pty Ltd on info@interre.com.au or sending a request to the address below. Upon receiving such a request, InterRe Insurance Broker Pty Ltd will remove your contact details from our distribution lists.

InterRe Insurance Broker Pty Ltd may transfer your personal information to overseas countries including but not limited to e.g. European Union countries in order to perform one or more of our functions or activities. In these circumstances, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Personal information may need to be disclosed to external service providers or third parties engaged by InterRe Insurance Brokers Pty Ltd in order for those service providers to fulfil their service obligations to the firm.

For example:

- IT service providers who assist in managing InterRe Insurance Broker Pty Ltd servers and networks may need to access client data in order to maintain the servers and networks;
- Loss Adjusters, solicitors and experts engaged on behalf of a client to provide a legal or expert opinion for a client matter may require access to certain personal information held by InterRe Insurance Broker Pty Ltd in relation to that matter in order to provide the opinion.

Where personal information is disclosed to an external party, InterRe Insurance Broker Pty Ltd will take reasonable steps to ensure that the external party treats such information confidentially and in accordance with the APPs.

There may be circumstances in which it is necessary for InterRe Insurance Broker Pty Ltd to collect an individual's government related identifier such as an abn number. We will not use or disclose government related identifiers unless we are required or authorized to do so by law or by a court or tribunal order, or in order to fulfill our obligations to a State or Territory authority.

Accuracy of Personal Information

InterRe Insurance Brokers Pty Ltd will take reasonable steps to ensure that all personal information it collects, uses or discloses is accurate, complete and up-to-date.

If you believe your personal information is not accurate, complete or up-to-date, please contact us (see the **Contacting Us** section for more information).

Security

Personal information may be stored by InterRe Insurance Broker Pty Ltd in hard copy documents or electronically. InterRe Insurance Brokers Pty Ltd is committed to keeping personal information secure and safe. Some of the ways we do this are:

- Security measures for access to our computer systems.
- Providing a discreet environment for confidential discussions.
- Access control for our buildings.
- Security measures for our websites (see the **Your Privacy on the Internet** section for more information).

We will review and update our security measures from time to time.

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In addition, we will review the personal information held by us from time to time, ensuring that information which is no longer needed for a purpose for which it was initially collected is destroyed or de-identified (provided it is lawful for us to do so).

Your Privacy on the Internet

InterRe Insurance Broker Pty Ltd takes care to ensure that the information you provide to us via our website is protected. For example, our website has electronic security systems in place, including the use of firewalls.

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

InterRe Insurance Broker Pty Ltd internet service provider makes a record of each visit to InterRe Insurance Broker Pty Ltd web site. When you visit our website, the following information is logged for statistical purposes only:

- your server address
- your top level domain name (for example .com, .gov, .au, etc)
- the date and time of your visit to the site
- the pages accessed and documents downloaded by you
- the previous site visited by you
- the type of browser used by you

When you visit our website, our server will attach a small data file called a "cookie" to your computer's memory (unless your web browser is set to refuse cookies).

A "cookie" is a very small text file placed on your hard drive for record keeping purposes by our web page server. The cookie's purpose is to notify our web page server that the same visitor has returned to our web site and to collate anonymous information on when and how our website is used.

The information collected is not linked to your identity in any way or any other information provided by you.

Email Communications

If you have registered through our website to receive email communications from us and later change your mind, you may contact us to have your name removed from our distribution lists.

Accessing and Correcting Personal Information

You may request access to personal information that InterRe Insurance Broker Pty Ltd holds about you (see the **Contacting Us** section for more information).

We will acknowledge your request within 5 business days of the request being made. If access is being denied, we will usually advise you in writing of the denial of access and the reasons for same within 10 business days of our acknowledgement. If access is being granted, access will usually be granted within 10 business days of our acknowledgment or, if the request involves complex considerations or voluminous photocopying or scanning, within 10 business days. We will let you know which timeframe applies to your request and if any delays are anticipated.

You will need to verify your identity before access to your personal information is granted.

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While we cannot and do not charge an 'application fee' for you applying to access your personal information, we may charge a fee for actually giving you access to your personal information in your preferred format (where reasonable and possible), which will cover our costs involved in locating and collating information as well as reproduction costs.

Once your request has been processed by us, you may be forwarded the information by mail or email or you may personally inspect it at the location where the information is held or another appropriate place. Whenever possible, we will endeavor to make the information available to you in the manner requested by you unless it is unreasonable for us to do so (e.g. if you have asked for the information to be emailed to you, we will endeavor to email the information to you. If the file size would be too large, we may send you the information by hard copy instead of email).

If you are aware that we hold personal information about you that is no longer accurate, complete or up-to-date, please contact us (see the **Contacting Us** section for more information).

If you request access to your personal information, or if you request that we correct your personal information, we will allow access or make the correction unless we consider that there is a sound reason to withhold the information, or not make the correction.

Under the Act, we may refuse to grant access to personal information if:

- We believe that granting access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety.
- Granting access would have an unreasonable impact upon the privacy of other individuals.
- Denial of access is required or authorised by law or by a Court or Tribunal order.
- Giving access would be unlawful.
- The request for access is frivolous or vexatious.
- Legal proceedings are underway or anticipated and the information would not be accessible by way of the discovery process in those proceedings.
- Giving access would reveal our intentions in relation to negotiations between us and you in such a way as to prejudice those negotiations.
- Giving access is likely to prejudice enforcement related activities conducted by, or on behalf of, an enforcement body.
- Giving access is likely to prejudice action being taken or to be taken with respect to suspected unlawful activity or serious misconduct relating to our functions or activities.
- Giving access would reveal information in connection with a commercially sensitive decision making process.

If we do not agree to make a correction to your personal information, you may provide a statement about the requested corrections, and we will ensure that the statement is apparent to any users of the relevant personal information.

If we do not agree to provide access to your personal information or to correct your personal information, we will provide written reasons for the refusal and the mechanisms available to complain about the refusal (see the **Complaints** section for more information).

Complaints

If you believe there has been a breach of the APP's, you are entitled to complain to us. Please direct any complaints to our privacy contact below. We will investigate your complaint and endeavour to resolve it.

If you consider that we have not dealt with your complaint adequately, you may complain to the Office of the Australian Information Commissioner on the below details:

Post:

Office of the Australian Information Commissioner (OAIC)

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GPO Box 5218
SYDNEY NSW 2001

Email: enquiries@oaic.gov.au

Telephone: 1300 363 992

Contacting Us

To contact us about any privacy matter or to notify us that you wish to be removed from our distribution lists, please either:

- send us an email to: info@interre.com.au or
- send us a letter addressed as follows:

The Privacy Officer
InterRe Insurance Broker Pty Ltd
Po Box 1478
BEENLEIGH QLD 4207

Changes to our privacy policy

From time to time it may be necessary for us to revise our privacy policy. We reserve the right to change our privacy policy at any time without prior notice. We will notify you of the changes by posting an updated version of the policy on our website at www.interre.com.au